

**IN UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION**

NO.: 7:17-CR-3-BO

UNITED STATES OF AMERICA	:	
	:	
VS.	:	<u>MOTION TO EXTEND TIME</u>
	:	<u>TO FILE OBJECTIONS TO PSR</u>
	:	
ERIC CHRISTOPHER HALL	:	
DEFENDANT	:	

The defendant, by and through his undersigned attorney, respectfully moves the Court for an Order extend the time to file objections to the presentence report in the above captioned matter until Monday, May 7, 2018. The grounds for this Motion are:

1. The defendant was found guilty after a jury trial at the February 12, 2018, session of Court.
2. The defendant moved for the appointment of new counsel and an Order was filed on February 28, 2018 allowing the motion to appointment new counsel and extending time to file a Rule 34 motion.
3. On March 1, 2018, the undersigned counsel filed a Notice of Appearance.
4. On March 14, 2018, the undersigned filed a Motion to Extend Time to file the Rule 34 motion.
5. On March 19, 2018, an Order was entered extending the time to file the Rule 34 motion to April 30, 2018.

6. The draft presentence report was filed Monday, April 9, 2018. The time for filing objections has not passed and is currently April 23, 2018. Sentencing is presently set for the May 14, 2018 term.

7. The undersigned has requested a transcript of the trial to determine if there are any grounds to support the filing of a Rule 34 motion but the court reporter had a death in her family and has not been able to get the transcript prepared.

8. The defendant is housed in Onslow County and in the interest of economy it would be best if the undersigned could talk to the defendant about the Rule 34 motion with the transcript and the objections to the presentence report at the same meeting.

9. Assistant United States Attorney, John Bennett has indicated he does not object to this continuance and Probation Officer Michelle Feliciano has been notified.

10. The motion is made in good faith and not for purpose of delay.

11. The ends of justice would be better served by granting this continuance.

WHEREFORE, The Defendant respectfully request that the time for filing objections be extended until May 7, 2018.

Respectfully submitted this 12th day of April 2018.

H.P. WILLIAMS, JR., PLLC

BY: /H.P. WILLIAMS, JR.
H.P. WILLIAMS, JR.
COURT APPOINTED ATTORNEY
FOR ERIC CHRISTOPHER HALL
STATE BAR #8566
203 NORTH ROAD STREET
ELIZABETH CITY, NC 27909
TEL: 252-337-4518

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served upon:

John Bennett
Assistant United States Attorney
215 South Evans St. Suite 206
Greenville, NC 27858

By electronically filing the foregoing with the Clerk on January 10, 2018, using the CM/ECF system which will send notification of such filing to the above.

This the 12th day of April 2018.

H.P. WILLIAMS, JR., PLLC

/S/ H.P. WILLIAMS, JR.

**H.P. WILLIAMS, JR.
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